



PEMBROKE TELEPHONE COMPANY, INC.

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FCC Mail Room

February 2, 2015

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

FILE COPY ORIGINAL

EB Docket 06-36

RE: Certification of CPNI Filing-March 1, 2015

Dear Ms. Dortch:

On behalf of Pembroke Telephone Company, Inc. please accept this filing of the Company's CPNI Certification and the statement of procedures for operation compliance with the FCC's CPNI rules.

Sincerely,

*Mary Anna B. Hite*

Mary Anna B. Hite  
Secretary-Treasurer

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Enclosures

No. of Copies rec'd 0+4  
List ABCDE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2014

Date filed: 02/02/2015

Name of companies covered by this certification:

Pembroke Telephone Company, Inc.  
FCC Filer ID 809642

Pembroke Advanced Communications, Inc.  
FCC Filer ID 824212

Name of Signatory: Mary Anna B. Hite

Title of Signatory: Secretary-Treasurer

I, Mary Anna B. Hite, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

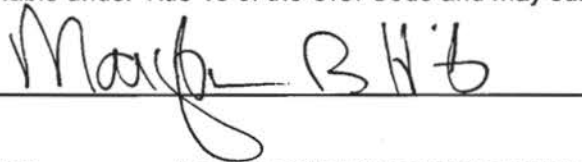
Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements (including those mandating the adoption of CPNI Procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The companies represent and warrant that the above certification is consistent with 47.C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject them to enforcement action.

Signed



Attachments:

Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (if applicable)  
Summary of customer complaints (if applicable)

Pembroke Telephone Company, Inc. -- FCC 499 Filer ID 809642

Pembroke Advanced Communications -- FCC 499 Filer ID 824212

Pembroke, GA

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### CERTIFICATION

I am the Chief Financial Officer/Secretary Treasurer of Pembroke Telephone Company, Inc. On behalf of Pembroke Telephone Company, Inc., an ILEC operating in Georgia and its affiliate Pembroke Advanced Communications, (collectively "Pembroke"), I hereby certify that I have personal knowledge that Pembroke is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.<sup>1</sup> Accompanying this certificate is a statement of how Pembroke is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Mary Anna Hite  
Chief Financial Officer/Secretary Treasurer  
Pembroke Telephone Company, Inc.

Date: 2/2/2015

<sup>1</sup> 47 C.F.R. §§ 64.2000-2009



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### STATEMENT OF FCC CPNI RULES CERTIFICATION

This statement serves to explain how Pembroke Telephone Company, Inc., an ILEC operating in Georgia and its affiliate Pembroke Advanced Communications (collectively "the Company" or "Company") are in compliance with the Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained in Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any segregation or refinement based on CPNI.*

#### 1. Identification of CPNI

The Company has established procedures and trained employees having access to or occasion to use customer data to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

#### 2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the Company that affect how the Company uses CPNI.

#### 3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to or occasion to use CPNI to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

#### 4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use, CPNI to identify uses of CPNI requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(d) as circumstances require.

## STATEMENT OF FCC CPNI RULES CERTIFICATION

### **5. Customer Notification and Authorization Procedures**

Because the Company has not used and does not at this time plan to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the Company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the FCC's CPNI rules at Part 64, Subpart U, Section 64.2007(f)(2).

### **6. Training**

The Company has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

### **7. Record of Customer CPNI Approval/Non-approval**

Prior to undertaking to use CPNI for marketing, the Company will develop a system for maintaining readily accessible records of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules..

### **8. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

### **9. Software Safeguards**

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

### **10. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.